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10 *Attorneys for Defendant*  
11 *Southwest Medical Associates, Inc.*

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14 **UNITED STATES DISTRICT COURT**  
15 **DISTRICT OF NEVADA**

16 MARGUERITE BRATHWAITE, M.D., an  
17 individual,

18 Plaintiff,

19 v.

20 SOUTHWEST MEDICAL ASSOCIATES,  
21 INC., an active Nevada domestic Corporation;  
22 DOES 1-10 and ROE ENTITIES 1-10,  
23 inclusive.

24 Defendants.

25 Case No.: 2:22-cv-00729-JCM-NJK

26 **STIPULATION TO EXTEND THE**  
27 **MARCH 22, 2024 DEADLINE TO**  
28 **FILE DISMISSAL DOCUMENTS**

29 **First Request**

30 IT IS HEREBY STIPULATED by and between Plaintiff Marguerite Brathwaite, M.D.,  
31 (“Plaintiff”), through her counsel F. TRAVIS BUCHANAN, ESQ., of the law firm F. TRAVIS  
32 BUCHANAN, ESQ., & ASSOCIATES, PLLC., and RODNEY S. DIGGS, of the law firm IVIE  
33 McNEILL WYATT PURCELL & DIGGS, and SOUTHWEST MEDICAL ASSOCIATES, INC.,  
34 (“Defendant”) through its counsel JACKSON LEWIS P.C., that the current March 22, 2024,  
35 deadline to file dismissal paperwork be extended May 6, 2024.

36 1. On January 24, 2024, Magistrate Judge Koppe entered a report and recommendation  
37 that Defendant’s Motion to Enforce Settlement be granted. ECF No. 90.  
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1       2. On February 23, 2024, Judge Mahan entered an order adopting Magistrate Judge  
2 Koppe's report and recommendation. ECF No. 99.

3       3. Judge Mahan further ordered the parties to submit the required dismissal paperwork  
4 by March 22, 2024. ECF No. 99.

5       4. Following these orders, the parties began working on resolving the outstanding  
6 disputes regarding the specific language in the settlement agreement. However, on or around March  
7 12, 2024, an associate in the Las Vegas Office of Jackson Lewis, P.C. suffered a medical emergency  
8 which unexpectedly requires an extended period of medical leave. This unexpected emergency has  
9 required both counsels for Defendant to immediately begin work on other matters assigned to the  
10 associate. As a result, the parties were unable to complete the final revisions to the settlement  
11 agreement prior to March 22, 2024.

12       5. The parties have recently resolved the disagreements regarding the specific language  
13 and believe a finalized settlement agreement will be signed by both parties shortly. Following the  
14 signing of the settlement agreement, payment will be completed and the parties will file a stipulation  
15 for dismissal with prejudice. The parties anticipate this process will take approximately 30-45 days  
16 to complete.

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1       6.     Accordingly, the parties hereby stipulate and agree that the March 22, 2024, deadline  
2 to submit dismissal paperwork be extended to May 6, 2024.

3       7.     This request is made in good faith and not for the purpose of delay.

4                   DATED this 22nd day of March, 2024

5                   F. TRAVIS BUCHANAN, ESQ., & ASSOC.,  
6                   PLLC

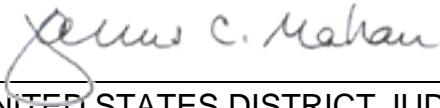
5                   JACKSON LEWIS P.C.

7                   */s/ F. Travis Buchanan*  
8                   F. Travis Buchanan, Bar No. 9371  
9                   701 East Bridger Ave., Suite 540  
10                  Las Vegas, Nevada 89101

7                   */s/ Deverie J. Christensen*  
8                   Deverie J. Christensen, Bar No. 6596  
9                   Katlyn M. Brady, Bar No. 14173  
10                  300 S. Fourth Street, Ste. 900  
11                  Las Vegas, Nevada 89101  
12                  Attorneys for Defendant  
13                  Southwest Medical Associates, Inc.

11                   **ORDER**

12                  IT IS SO ORDERED:

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14                   \_\_\_\_\_  
15                  UNITED STATES DISTRICT JUDGE

16                  Dated: March 22, 2024        \_\_\_\_\_  
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4893-6196-5232, v.1